UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-Form Complaint and:

Robert Holt, et al. v. National Football League, et al.

Court File No. 2:12-cv-4185-AB

MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL
FOR PLAINTIFF ELSTON RIDGLE

Charles S. Zimmerman, J. Gordon Rudd, Jr., and Brian C. Gudmundson of Zimmerman Reed LLP ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Elston Ridgle only in this action, and state as follows:

- 1. Plaintiffs' counsel filed the action *Robert Holt, et al. v. National Football League, et al.*, No. 2:12-cv-4185-AB, in the Eastern District of Pennsylvania on July 23, 2012, for the benefit of several retired National Football League players, including Elston Ridgle.
- 2. Plaintiffs' counsel filed a short form complaint for Elston Ridgle on August 20, 2012.

- 3. Since then, irreconcilable differences have arisen between Plaintiff Elston Ridgle and the undersigned.
- 4. Plaintiffs' counsel properly notified Elston Ridgle of counsel's intention to withdraw from representing him in this matter.
- 5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for Elston Ridgle only in Court File No. 2:12-cv-4185-AB.

Dated: November 17, 2016 Respectfully submitted,

ZIMMERMAN REED LLP

s/ Charles S. Zimmerman

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